REMARKS

Applicants' representative thanks the Examiner for his time during the telephone interview of January 5, 2005. Applicants' representative discussed the Final Office Action with the Examiner, and the Examiner indicated that the claims may be further distinguished from U.S. Patent No. 5,263,162 to Bush et al. (hereinafter "Bush") by including a limitation in the claims that a user enters the cryptographically-generated PIN. Support for this limitation can be found in the Specification, e.g., at page 12, lines 19-20. By the foregoing amendment, Applicants have included such a limitation in independent claims 1, 17, 33 and 49.

In the Final Office Action, claims 1-13, 17-29 and 33-45, 49 and 50 are rejected under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,263,162 to Bush et al. (hereinafter "Bush"). The remaining claims are rejected as inherent in view of Bush.

Applicants respectfully traverse the rejections of record.

Independent claim 1 as amended is directed to a method for generating identification data, comprising the steps of:

providing an ATM PIN related to a first transaction type that is an ATM transaction; and

performing a cryptographic operation upon the ATM PIN, thereby generating a non-ATM electronic commerce PIN based on said ATM PIN, said non-ATM electronic commerce PIN to be entered by a user in a second transaction type that is a non-ATM financial transaction.

Applicants incorporate fully and reiterate herein the arguments set forth in Applicants' Amendment dated July 2, 2004 respecting the arguments repeated in the Final Office Action.

Additionally, Applicants have amended claim 1 to recite that the non-ATM electronic commerce PIN is to be *entered by a user* in a second transaction type. The CGIPIN of Bush,

which the Examiner equates to the cryptographically-generated non-ATM electronic commerce PIN of the present invention, is produced by a central computer and by a PIN card, and is then transmitted and compared electronically without any interaction from the cardholder. (*See*, *e.g.*, Bush, col. 2, lns. 26-34). The CGIPIN of Bush, therefore, would be incapable of performing certain non-ATM electronic financial transactions, such as ecommerce transactions via the internet, during which a user may be required to enter account and PIN information to complete a transaction. For at least this additional reason, Bush cannot anticipate claim 1. By the foregoing amendment, similar limitations have been added to claims 17, 33 and 49. For the same reasons, Bush fails to disclose or suggest one or more limitations of these claims.

In view of the foregoing, Applicants submit that claims 1-13, 17-29, 33-45, 49 and 50, all of the pending claims as amended, are in condition for allowance. In the event that the application is not deemed in condition for allowance, the Examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,

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